

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARY K. BOLEY, *et al.*,

Plaintiffs,

v.

UNIVERSAL HEALTH SERVICES, INC., *et al.*,

Defendants.

Case No: 2:20-cv-02644

February 15, 2023

DECLARATION OF JAMES C. SHAH

I, James C. Shah, declare that the following is true and correct:

1. I am a partner at Miller Shah LLP, and am one of the attorneys representing Plaintiffs, Mary K. Boley, Kandie Sutter and Phyllis Johnson (“Plaintiffs”), in the above-captioned matter.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, can testify competently as to the matters stated in this Declaration. I respectfully submit this Declaration in Support of Plaintiffs’ Motion for Approval of Class Action Settlement.

3. Two class members, Karen E. Wolfram and Karen S. Whitesell filed letters with the Court that were styled as objections to the settlement of the action (“Settlement”).

4. Ms. Wolfram’s objection does not take issue with any substantive aspect of the Settlement. Rather, Ms. Wolfram notes that she has “no complaints about the Defendants . . . because [she] had a retirement plan that was administered by a professional entity.” I have placed several calls to Ms. Wolfram (at the telephone number noted in her correspondence) to determine whether she had any further questions about the Settlement. Despite my attempts to do so, I have not reached Ms. Wolfram and was unable to leave a message because her voicemail mailbox has not been set up.

5. Ms. Whitesell's objection, likewise, does not take issue with any substantive aspect of the Settlement. Rather, Ms. Whitesell's objection indicates a desire to have the notice provide more specificity about the nature of Plaintiffs' claims. I telephoned Ms. Whitesell and had an opportunity to speak with her and her husband, who assisted in drafting the objection. Although the Whitesells indicated that they would have preferred more specificity in the notice, they stated that they had visited the settlement website (using information provided in the notice) and reviewed the additional documents maintained there to gather more information about the case. After doing so, the Whitesells determined that they did not need to take any further action with respect to the Settlement. The Whitesells did not express any substantive concerns with the Settlement during our telephone call.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 15, 2023
in Philadelphia, Pennsylvania

/s/ James C. Shah
James C. Shah